

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA Title III

Case No. 17 BK 3567-LTS

**This Court Filing Relates Only to
HTA's Title III Case (Case No.
17-BK-3567-LTS)**

**RESERVATION OF RIGHTS OF
NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION
WITH RESPECT TO WITNESS AND EXHIBIT LISTS**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

National Public Finance Guarantee Corporation (“National”) hereby submits this reservation of rights with respect to filing revised, amended, and/or supplemental witness and exhibit lists (the “Reservation of Rights”) and respectfully states as follows:

RESERVATION OF RIGHTS

1. On June 22, 2022, the Court entered the *Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (ECF No. 21301, the “Confirmation and Discovery Procedures Order”). On July 13, 2022, the Court entered the *Order Regarding Procedures for Hearing on Confirmation of HTA Plan of Adjustment and August 17–18, 2022, Omnibus Hearing* (ECF No. 21494, the “Hearing Procedures Order”).

2. The Confirmation and Discovery Procedures Order sets July 27, 2022 as the deadline to file finalized witness lists, exhibit lists, and deposition designations. *See* Confirmation and Discovery Procedures Order ¶ 2; *see also* Hearing Procedures Order ¶ 6(d).

3. National did not have witnesses to designate as of July 1, 2022 and does not have exhibits to submit or witnesses to designate as of the date of this Reservation of Rights. However, National reserves all rights, including, but not limited to, the right to use exhibits identified on other parties’ exhibit lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, the right to designate and cross-examine witnesses, and the right to revise, amend, and/or supplement National’s witness and exhibit lists, for reasons including, but not limited to, the confirmation hearing is adjourned, the Plan is modified, or objections are filed and/or issues arise that implicate the interests of National. If National files a revised, amended, and/or supplemental witness list, National will provide an opportunity for the witness(es) to be deposed prior to the start of the confirmation hearing.

Dated: July 27, 2022

Respectfully submitted,

**ADSUAR MUNIZ GOYCO SEDA & PEREZ-
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CERTIFICATE OF SERVICE

I hereby certify that I caused this document to be filed electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At San Juan, Puerto Rico, the 27 day of July, 2022.

By: /s/ Eric Pérez-Ochoa